FW: Greg, pls review before I send this
Paul Gallagher
to:
Kenneth Bardo
08/29/2012 02:00 PM
Cc:
"Oberster, Alan C.", "Knott, Charles J."
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA,
Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

Hi Ken:

Here's a summary of our telephone conversation yesterday about the supplemental PCB cleanup at the former City Scrap & Salvage property in Akron, Ohio. Our responses to your four comments in your message below are:

1) Borings B618 and B619 were not associated with the supplemental PCB sampling outlined in our work plan dated July 11, 2012. These soil borings were contingency explorations for the petroleum hydrocarbon investigation near the former auto prep area. We archived the samples obtained from borings B618 and B619, pending the analyses of soil samples obtained from borings located closer to the former auto prep area. Since the total petroleum hydrocarbon concentrations in soils near the former auto prep area were favorable, there was no need to analyze additional samples from outbound borings B618 and B619.
2) At B616, the laboratory was unable to report a lower detection limit due to matrix interferences during the analyses, and the hold time expired before the lab could rerun the analysis. We resampled B616 last week, and the laboratory is currently analyzing a soil sample from this location. We're anticipating that the laboratory can achieve a lower detection (i.e., <1 ppm). The proposed excavation area will be adjusted if the concentration of PCBs at B616 is greater than 1 ppm.
3) The final report will provide the information requested below. As we discussed yesterday, some of the soil may be disposed of at a different landfill, because the TCLP lead concentration in the waste characterization composite sample was slightly greater than 5 milligrams per liter. Once the final disposal arrangements have been made, we will provide a follow-up email that specifies which landfills will be used.
4) Arrangements are being made to install the fence before the road construction activities begin.

Also, the attached figure shows an updated excavation plan. The location of the proposed fence area has been modified to allow TSB Metals to extend the existing concrete pad further to the east. This change allows the size of Excavation Area A to be reduced. Fill soils generated during construction activities for the proposed concrete pad extension will be managed within the proposed fence area.

Based on your verbal approval to proceed with the supplemental cleanup during our conversation yesterday, we will begin the excavation activities once disposal arrangements are finalized.

In a forthcoming email, we will send a draft revised deed restriction for your review. The draft revised deed restriction will: describe the rational for modifying the existing deed restriction, identify the location of the fence for which inspection and maintenance will be required in the future, and establish new boundaries for the existing land use restriction (i.e., the right-of-way for the connector road will not be subject to the existing land use restriction). A final draft deed restriction will be included in the forthcoming final report.

Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
T 330.668.6506 C 330.705.0543
www.sanbornhead.com

From: Paul Gallagher
Sent: Wednesday, July 11, 2012 12:15 PM
To: 'Kenneth Bardo'
Cc: 'Oberster, Alan C.'
Subject: FW: Former City Scrap - Connector Road

Hi Ken:

We're sending this message to summarize the upcoming supplemental soil sampling activities at the former City Scrap and Salvage property (Site). The attached Work Plan for Supplemental PCB Cleanup Activities is based on your message below and our follow-up telephone conversation. The objective of the supplemental soil sampling is to further develop our understanding of the distribution of PCBs in soils within the eastern portion of the fenced area, where the conditions of the prior PCB cleanup restricts how excavated soils can be managed. The findings of the supplemental soil sampling will be the basis for our development of a Soil Management and Disposal Plan, which will be submitted for your approval.

The City is still working out some of the contracting issues for the road, but they hope to start the road construction later this summer. We have tentatively scheduled activities for the soil sampling to begin later this week, and we anticipate that we will complete the Soil Management and Disposal Plan for your review in early August.

Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

Hi Ken,

Thanks for calling me today. I have attached the updated figures that I mentioned. As we discussed, here's the key issues that we have identified regarding the proposed connector road through the western portion of the site:

1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.

2) The road cut will require soils that are currently located within the fenced area to be reused as fill near the eastern end of the site. As shown on the attached figures, a portion of the excavated soils will have concentrations of PCBs greater than 1 ppm, so they will need to be managed appropriately.

3) The City of Akron wants to begin earthwork this summer, and we're trying to support their schedule.

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

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Project Director

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[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US]

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Paul P. Gallagher, P.G., C.P.
Project Director

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Sent: Wednesday, July 11, 2012 12:15 PM
To: 'Kenneth Bardo'
Cc: 'Oberster, Alan C.'
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RE: Former City Scrap - Connector Road
Paul Gallagher
to:
Kenneth Bardo
06/26/2012 08:26 AM
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA,

Thanks, Ken. I'll try to call you this afternoon to discuss what we'll do next.

--
Paul P. Gallagher, P.G., C.P.
Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]
Sent: Friday, June 22, 2012 6:30 PM
To: Paul Gallagher
Cc: Oberster, Alan C.
Subject: Re: Former City Scrap - Connector Road

paul, took a look at the info and offer the following observations.

- much of the cut-and-fill area for the connector road is outside of the restricted (fenced) area and does not require an action.
- the cut area within the restricted (fenced) area is not fully characterized for PCBs. the perimeter 7 samples have some detections both above and below 1 ppm and the 6 samples within the cut area all have detections below 1 ppm.
- EPA recommends that the eastern-half of the cut area within the restricted (fenced) area have a least 6 samples taken to confirm if PCB levels remain at <1 ppm at 0-2'.
- also, the western edge of the cut area adjacent to the new concrete pad should have at least 3 samples taken at 0-2' to see if PCB levels are >1ppm.
- based on these sample results, manage cut soils within the restricted (fenced) area accordingly. that is, soils with <1ppm PCBs can be used as fill. soils with PCBs >1ppm but <10 ppm can be managed onsite within the restricted (fenced) area if room is available or disposed of properly offsite if room is not available.
- the new fence may be placed at the perimeter of the cut area/edge of the new connector road feeding the new auto prep building.
- update Exhibit A and B of the deed restriction to define the new restricted area when work is complete.
- have a company representative onsite during the cut activities within the restricted (fenced) area to observe if anything unusual is encountered at depth (i.e., waste material, staining, etc.) that needs to be segregated and characterized to determine if it is appropriate fill material or should be properly disposed of offsite.

CONESTOGA-ROVERS
& ASSOCIATES

9033 Meridian Way, West Chester, Ohio 45069
Telephone: (513) 942-4750 Facsimile: (513) 942-8585
www.CRAworld.com

January 17, 2013

Reference No. 077241

CONFIDENTIAL INFORMATION

Mr. Peter Ramanauskas
U.S. EPA Region V
77 W. Jackson Blvd. (LU-9J)
Chicago, IL 60604

Dear Mr. Ramanauskas:

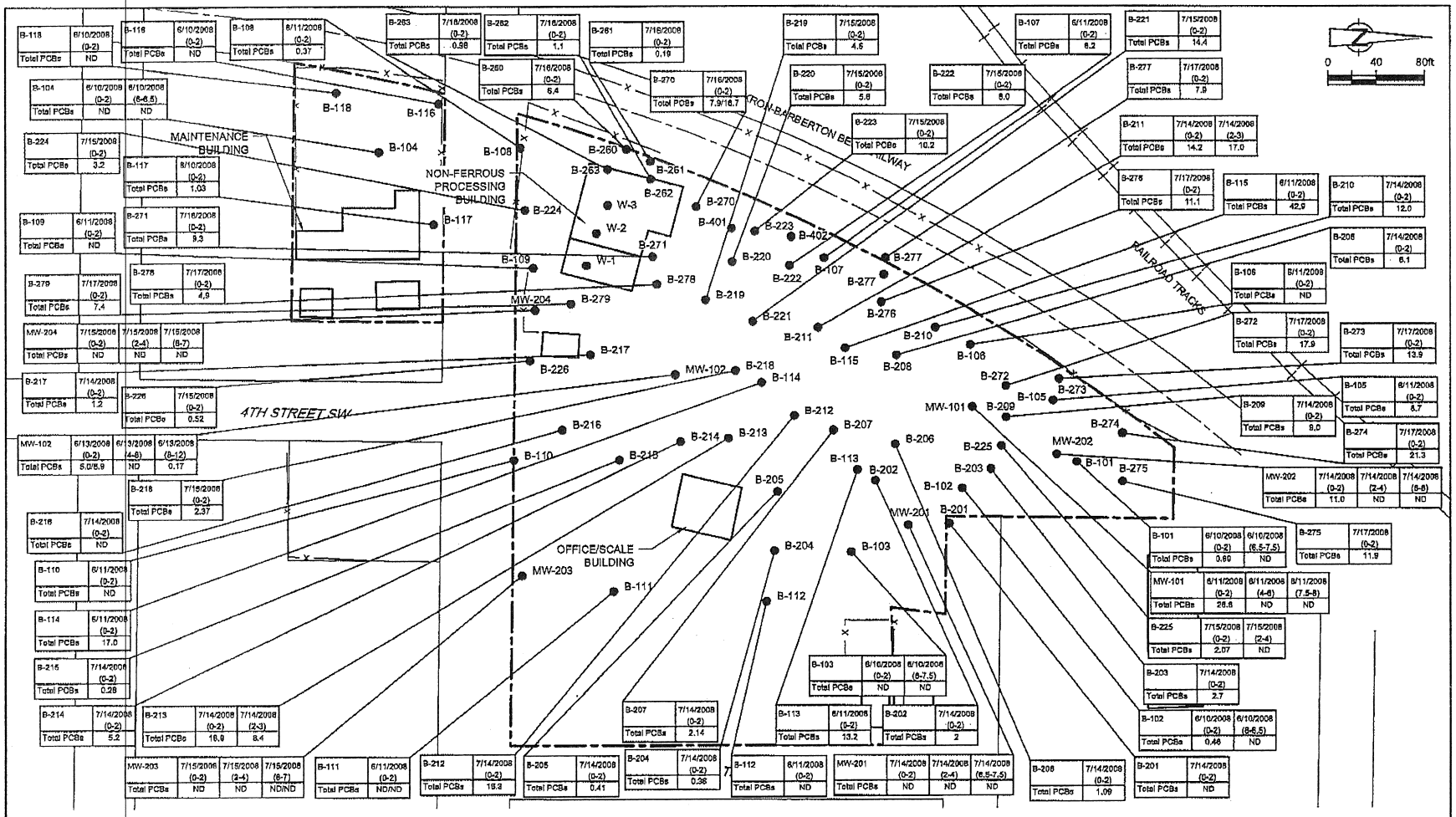
Re: Disposal of PCB Impacted Soils and Debris
Upper Yard Area
Former City Scrap and Salvage Facility
Akron, Ohio

On behalf of our client, ASR Katz Company (ASR), we are providing additional data which should be considered during your determination on the disposal of Polychlorinated Biphenyls (PCB) impacted soils and debris located at the Former City Scrap & Salvage Upper Yard (Site), located at 611 W Wilbeth Road in Akron, Ohio. This letter presents additional information that should be reviewed in conjunction with the letter that was sent to you, dated January 11, 2013.

In our telephone conversation on January 14, 2013, you stated that after a preliminary review of the January 11, 2013 letter, it appeared that the "anti dilution rule" under TSCA (40 CFR 761.1) had been violated and as a consequence, all soil piles at the Site containing PCBs would be considered a TSCA waste that would need to be disposed of in a licensed TSCA landfill.

Our client disagrees with this assessment based on the following two reasons:

In 2008 a Phase II investigation was conducted at the Site as part of a potential property transaction. During the investigation, Site soils were sampled by Sandborn Head & Associates (SHA) on behalf of their client, The Timken Company (Timken). The analysis of soil samples collected at the Site recorded low to moderate levels of PCBs with no samples recording a concentration of total PCBs at 50 parts per million (ppm) or higher. This data was shared with Site owner, City Scrap & Salvage (now ASR). Having this data in their possession, there was no reason why ASR would suspect that PCB contaminated soils existed on Site, and that they would be "diluting" TSCA material if they created soil piles as a result of the metal mining operation. The soil in the piles is composed of soil that was previously characterized during the SHA Phase II investigation. No additional fill material was added to the soil piles. Table 1 contains a summary of the analytical data collected by SHA during the Site investigation they conducted for Timken. Figure 1 presents the SHA soil sample locations and analytical results.



LEGEND

- PROPERTY BOUNDARY
- RAILROAD TRACKS
- FENCE

B-258 | 7/21/2008 (0-2) | Total PCBs 38.1

- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH
- RESULT (mg/kg)
- PARAMETER

SOURCES:
SUMMIT COUNTY FISCAL OFFICE TAX MAP (GIS)
THE TIMKEN COMPANY, 2927.00ITY SCRAP REPORT, AUGUST 21, 2008
ACCURATE TECHNOLOGIES ALTA/ACSM LAND TITLE SURVEY, PROJECT NO. T-1593, AUGUST 2006.

figure 1

TOTAL PCB CONCENTRATIONS
UPPER PARCEL
FORMER CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

77241-01(RAMA002)GN-WA001 JAN 16/2013

TABLE 1
SHA SOIL ANALYTICAL SUMMARY
CITY SCRAP SITE UPPER YARD
AUGUST 2008

AOI:		*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*
Sample Location:		*B-101*	*B-101*	*B-102*	*B-102*	*B-103*	*B-103*
Sample ID:		*B-101 S-1,0-2'*	*B-101 S-4,6.5-7.5'*	*B-102 S-1,0-2'*	*B-102 S-4,6-6.5'*	*B-103 S-1,0-2'*	*B-103 S-4,6-7.5'*
Sample Date:		*6/10/2008*	*6/10/2008*	*6/10/2008*	*6/10/2008*	*6/10/2008*	*6/10/2008*
Sample Type:							
Sample Depth:		*(0-2) ft BGS*	*(6.5-7.5) ft BGS*	*(0-2) ft BGS*	*(6-6.5) ft BGS*	*(0-2) ft BGS*	*(6-7.5) ft BGS*
Parameters	*Units*						
PCBs							
Aroclor-1016 (PCB-1016)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1221 (PCB-1221)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1232 (PCB-1232)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1242 (PCB-1242)	mg/kg	0.44	0.12 U	0.15	0.12 U	0.11 U	0.12 U
Aroclor-1248 (PCB-1248)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1254 (PCB-1254)	mg/kg	0.25	0.12 U	0.31	0.12 U	0.11 U	0.12 U
Aroclor-1260 (PCB-1260)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1268 (PCB-1268)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Total PCBs	mg/kg	0.69	0.12 U	0.46	0.12 U	0.11 U	0.12 U

Notes:
U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
J - The associated value is qualified as an estimated quantity.
UJ -The analyte was reported or qualified as not detected however, the sample report limit is qualified as an estimated value and may be inaccurate or imprecise.
R - The data is qualified as unusable. (Note: Analyte may or may not be present).

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Sample Location:		*B-111*	*B-111*	*B-112*	*B-113*	*B-114*	*B-115*	*B-116*	*B-117*
Sample ID:		*B-111 S-1,0-2'*	*Dup6-11-08*	*B-112 S-1,0-2'*	*B-113 S-1,0-2'*	*B-114 S-1,0-2'*	*B-115 S-1,0-2'*	*B-116 S-1,0-2'*	*B-117 S-1,0-2'*
Sample Date:		*6/11/2008*	*6/11/2008*	*6/11/2008*	*6/11/2008*	*6/11/2008*	*6/11/2008*	*6/10/2008*	*6/10/2008*
Sample Type:			*(Duplicate)*						
Sample Depth:		*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*
Parameters	*Units*								
PCBs									
Aroclor-1016 (PCB-1016)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1221 (PCB-1221)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1232 (PCB-1232)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1242 (PCB-1242)	mg/kg	0.12 U	0.12 U	0.12 U	8.8	12	33	0.13 U	0.59
Aroclor-1248 (PCB-1248)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1254 (PCB-1254)	mg/kg	0.12 U	0.12 U	0.12 U	4.4	5	9.9	0.13 U	0.44
Aroclor-1260 (PCB-1260)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1268 (PCB-1268)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Total PCBs	mg/kg	0.12 U	0.12 U	0.12 U	13.2	17	42.9	0.13 U	1.03

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AUGUST 2008

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Sample Location:		*B-208*	*B-209*	*B-210*	*B-211*	*B-211*	*B-212*	*B-213*	*B-213*
Sample ID:		*B-208 S-1 0-2*	*B-209 S-1 0-2*	*B-210 S-1 0-2*	*B-211 S-1 0-2*	*B-211 S-2 2-3*	*B-212 S-1 0-2*	*B-213 S-1 0-2*	*B-213 S-2 2-3*
Sample Date:		*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*
Sample Type:									
Sample Depth:		*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(2-3) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(2-3) ft BGS*
Parameters	*Units*								
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Aroclor-1248 (PCB-1248)	mg/kg	0.10 U	0.98 U	0.10 U	0.10 U	0.096 U	1.0 U	1.1 U	0.93 U
Aroclor-1254 (PCB-1254)	mg/kg	3.2	4.2	6.6	4.8	5	5.3	7.9	5
Aroclor-1260 (PCB-1260)	mg/kg	0.10 U	0.98 U	0.10 U	0.10 U	0.096 U	1.0 U	1.1 U	0.93 U
Aroclor-1268 (PCB-1268)	mg/kg	-	-	-	-	-	-	-	-
Total PCBs	mg/kg	8.1	9	12	14.2	17	16.3	16.9	8.4

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Sample Location:		*B-222*	*B-223*	*B-224*	*B-225*	*B-225*	*B-226*	*B-260*	*B-261*
Sample ID:		*B-222 S-1 0-2*	*B-223 S-1 0-2*	*B-224 S-1 0-2*	*B-225 S-1 0-2*	*B-225 S-2 2-4*	*B-226 S-1 0-2*	*B-260*	*B-261*
Sample Date:		*7/15/2008*	*7/15/2008*	*7/15/2008*	*7/15/2008*	*7/15/2008*	*7/15/2008*	*7/16/2008*	*7/16/2008*
Sample Type:									
Sample Depth:		*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(2-4) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*
Parameters	*Units*								
PCBs									
Aroclor-1016 (PCB-1016)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1221 (PCB-1221)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1232 (PCB-1232)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1242 (PCB-1242)	mg/kg	4.9	4.8	0.10 U	0.87	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1248 (PCB-1248)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1254 (PCB-1254)	mg/kg	3.1	5.4	3.2	1.2	0.10 U	0.52	6.4	0.098 U
Aroclor-1260 (PCB-1260)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.19
Aroclor-1268 (PCB-1268)	mg/kg	-	-	-	-	-	-	-	-
Total PCBs	mg/kg	8	10.2	3.2	2.07	0.10 U	0.52	6.4	0.19

TABLE 1
SHA SOIL ANALYTICAL SUMMARY
CITY SCRAP SITE UPPER YARD
AUGUST 2008

AOI:		*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*
Sample Location:		*B-275*	*B-276*	*B-277*	*B-278*	*B-279*
Sample ID:		*B-275 S-1 0-2*	*B-276 S-1 0-2*	*B-277 S-1 0-2*	*B-278 S-1 0-2*	*B-279 S-1 0-2*
Sample Date:		*7/17/2008*	*7/17/2008*	*7/17/2008*	*7/17/2008*	*7/17/2008*
Sample Type:						
Sample Depth:		*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*
Parameters	*Units*					
PCBs						
Aroclor-1016 (PCB-1016)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1221 (PCB-1221)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1232 (PCB-1232)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1242 (PCB-1242)	mg/kg	2.3	4.1	3.6	2.4	3.7
Aroclor-1248 (PCB-1248)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1254 (PCB-1254)	mg/kg	9.6	7.1	4.3	2.5	3.7
Aroclor-1260 (PCB-1260)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1268 (PCB-1268)	mg/kg	-	-	-	-	-
Total PCBs	mg/kg	11.9	11.2	7.9	4.9	7.4

FW: Former City Scrap - Connector Road
Paul Gallagher
to:
Kenneth Bardo
07/11/2012 11:22 AM
Cc:
"Oberster, Alan C."
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA,
Cc: "Oberster, Alan C." <alan.oberster@timken.com>

1 Attachment

20120711 TSB PCB prop.pdf

Hi Ken:

We're sending this message to summarize the upcoming supplemental soil sampling activities at the former City Scrap and Salvage property (Site). The attached Work Plan for Supplemental PCB Cleanup Activities is based on your message below and our follow-up telephone conversation. The objective of the supplemental soil sampling is to further develop our understanding of the distribution of PCBs in soils within the eastern portion of the fenced area, where the conditions of the prior PCB cleanup restricts how excavated soils can be managed. The findings of the supplemental soil sampling will be the basis for our development of a Soil Management and Disposal Plan, which will be submitted for your approval.

The City is still working out some of the contracting issues for the road, but they hope to start the road construction later this summer. We have tentatively scheduled activities for the soil sampling to begin later this week, and we anticipate that we will complete the Soil Management and Disposal Plan for your review in early August.

Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

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3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
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www.sanbornhead.com

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

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[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US]

CONESTOGA-ROVERS
& ASSOCIATES

9033 Meridian Way, West Chester, Ohio 45069
Telephone: (513) 942-4750 Facsimile: (513) 942-8585
www.CRAworld.com

January 17, 2013

Reference No. 077241

CONFIDENTIAL INFORMATION

Mr. Peter Ramanauskas
U.S. EPA Region V
77 W. Jackson Blvd. (LU-9J)
Chicago, IL 60604

Dear Mr. Ramanauskas:

Re: Disposal of PCB Impacted Soils and Debris
Upper Yard Area
Former City Scrap and Salvage Facility
Akron, Ohio

On behalf of our client, ASR Katz Company (ASR), we are providing additional data which should be considered during your determination on the disposal of Polychlorinated Biphenyls (PCB) impacted soils and debris located at the Former City Scrap & Salvage Upper Yard (Site), located at 611 W Wilbeth Road in Akron, Ohio. This letter presents additional information that should be reviewed in conjunction with the letter that was sent to you, dated January 11, 2013.

In our telephone conversation on January 14, 2013, you stated that after a preliminary review of the January 11, 2013 letter, it appeared that the "anti dilution rule" under TSCA (40 CFR 761.1) had been violated and as a consequence, all soil piles at the Site containing PCBs would be considered a TSCA waste that would need to be disposed of in a licensed TSCA landfill.

Our client disagrees with this assessment based on the following two reasons:

In 2008 a Phase II investigation was conducted at the Site as part of a potential property transaction. During the investigation, Site soils were sampled by Sandborn Head & Associates (SHA) on behalf of their client, The Timken Company (Timken). The analysis of soil samples collected at the Site recorded low to moderate levels of PCBs with no samples recording a concentration of total PCBs at 50 parts per million (ppm) or higher. This data was shared with Site owner, City Scrap & Salvage (now ASR). Having this data in their possession, there was no reason why ASR would suspect that PCB contaminated soils existed on Site, and that they would be "diluting" TSCA material if they created soil piles as a result of the metal mining operation. The soil in the piles is composed of soil that was previously characterized during the SHA Phase II investigation. No additional fill material was added to the soil piles. Table 1 contains a summary of the analytical data collected by SHA during the Site investigation they conducted for Timken. Figure 1 presents the SHA soil sample locations and analytical results.

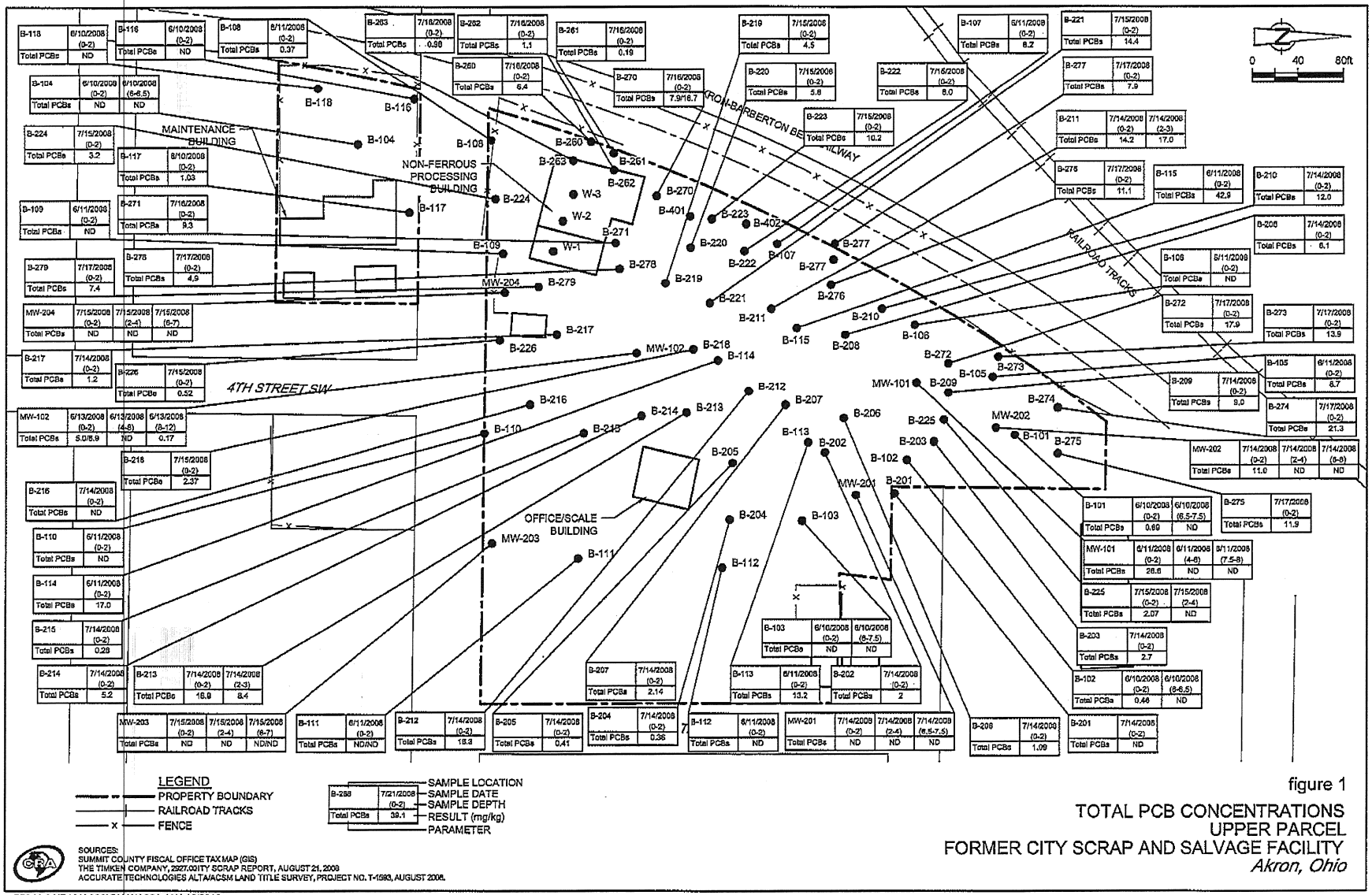

figure 1

TOTAL PCB CONCENTRATIONS
UPPER PARCEL
FORMER CITY SCRAP AND SALVAGE FACILITY
Akron, Ohio

77241-01(RAMA002)GN-WA001 JAN 16/2013

TABLE 1
SHA SOIL ANALYTICAL SUMMARY
CITY SCRAP SITE UPPER YARD
AUGUST 2008

AOI:		*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*
Sample Location:		*B-101*	*B-101*	*B-102*	*B-102*	*B-103*	*B-103*
Sample ID:		*B-101 S-1,0-2'*	*B-101 S-4,6.5-7.5'*	*B-102 S-1,0-2'*	*B-102 S-4,6-6.5'*	*B-103 S-1,0-2'*	*B-103 S-4,6-7.5'*
Sample Date:		*6/10/2008*	*6/10/2008*	*6/10/2008*	*6/10/2008*	*6/10/2008*	*6/10/2008*
Sample Type:							
Sample Depth:		*(0-2) ft BGS*	*(6.5-7.5) ft BGS*	*(0-2) ft BGS*	*(6-6.5) ft BGS*	*(0-2) ft BGS*	*(6-7.5) ft BGS*
Parameters	*Units*						
PCBs							
Aroclor-1016 (PCB-1016)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1221 (PCB-1221)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1232 (PCB-1232)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1242 (PCB-1242)	mg/kg	0.44	0.12 U	0.15	0.12 U	0.11 U	0.12 U
Aroclor-1248 (PCB-1248)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1254 (PCB-1254)	mg/kg	0.25	0.12 U	0.31	0.12 U	0.11 U	0.12 U
Aroclor-1260 (PCB-1260)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Aroclor-1268 (PCB-1268)	mg/kg	0.12 U	0.12 U	0.12 U	0.12 U	0.11 U	0.12 U
Total PCBs	mg/kg	0.69	0.12 U	0.46	0.12 U	0.11 U	0.12 U

Notes:
U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
J - The associated value is qualified as an estimated quantity.
UJ -The analyte was reported or qualified as not detected however, the sample report limit is qualified as an estimated value and may be inaccurate or imprecise.
R - The data is qualified as unusable. (Note: Analyte may or may not be present).

TABLE 1
SHA SOIL ANALYTICAL SUMMARY
CITY SCRAP SITE UPPER YARD
AUGUST 2008

AOI:		*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*
Sample Location:		*B-111*	*B-111*	*B-112*	*B-113*	*B-114*	*B-115*	*B-116*	*B-117*
Sample ID:		*B-111 S-1,0-2'*	*Dup6-11-08*	*B-112 S-1,0-2'*	*B-113 S-1,0-2'*	*B-114 S-1,0-2'*	*B-115 S-1,0-2'*	*B-116 S-1,0-2'*	*B-117 S-1,0-2'*
Sample Date:		*6/11/2008*	*6/11/2008*	*6/11/2008*	*6/11/2008*	*6/11/2008*	*6/11/2008*	*6/10/2008*	*6/10/2008*
Sample Type:			*(Duplicate)*						
Sample Depth:		*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*
Parameters	*Units*								
PCBs									
Aroclor-1016 (PCB-1016)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1221 (PCB-1221)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1232 (PCB-1232)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1242 (PCB-1242)	mg/kg	0.12 U	0.12 U	0.12 U	8.8	12	33	0.13 U	0.59
Aroclor-1248 (PCB-1248)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1254 (PCB-1254)	mg/kg	0.12 U	0.12 U	0.12 U	4.4	5	9.9	0.13 U	0.44
Aroclor-1260 (PCB-1260)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Aroclor-1268 (PCB-1268)	mg/kg	0.12 U	0.12 U	0.12 U	1.1 U	1.2 U	2.3 U	0.13 U	0.22 U
Total PCBs	mg/kg	0.12 U	0.12 U	0.12 U	13.2	17	42.9	0.13 U	1.03

TABLE 1
SHA SOIL ANALYTICAL SUMMARY
CITY SCRAP SITE UPPER YARD
AUGUST 2008

AOI:		*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*
Sample Location:		*B-208*	*B-209*	*B-210*	*B-211*	*B-211*	*B-212*	*B-213*	*B-213*
Sample ID:		*B-208 S-1 0-2*	*B-209 S-1 0-2*	*B-210 S-1 0-2*	*B-211 S-1 0-2*	*B-211 S-2 2-3*	*B-212 S-1 0-2*	*B-213 S-1 0-2*	*B-213 S-2 2-3*
Sample Date:		*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*	*7/14/2008*
Sample Type:									
Sample Depth:		*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(2-3) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(2-3) ft BGS*
Parameters	*Units*								
PCBs									
Aroclor-1016 (PCB-1016)	mg/kg	0.10 U	0.98 U	0.10 U	0.10 U	0.096 U	1.0 U	1.1 U	0.93 U
Aroclor-1221 (PCB-1221)	mg/kg	0.10 U	0.98 U	0.10 U	0.10 U	0.096 U	1.0 U	1.1 U	0.93 U
Aroclor-1232 (PCB-1232)	mg/kg	0.10 U	0.98 U	0.10 U	0.10 U	0.096 U	1.0 U	1.1 U	0.93 U
Aroclor-1242 (PCB-1242)	mg/kg	4.9	4.8	5.4	9.4	12	11	9	3.4
Aroclor-1248 (PCB-1248)	mg/kg	0.10 U	0.98 U	0.10 U	0.10 U	0.096 U	1.0 U	1.1 U	0.93 U
Aroclor-1254 (PCB-1254)	mg/kg	3.2	4.2	6.6	4.8	5	5.3	7.9	5
Aroclor-1260 (PCB-1260)	mg/kg	0.10 U	0.98 U	0.10 U	0.10 U	0.096 U	1.0 U	1.1 U	0.93 U
Aroclor-1268 (PCB-1268)	mg/kg	-	-	-	-	-	-	-	-
Total PCBs	mg/kg	8.1	9	12	14.2	17	16.3	16.9	8.4

TABLE 1
SHA SOIL ANALYTICAL SUMMARY
CITY SCRAP SITE UPPER YARD
AUGUST 2008

AOI:		*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*
Sample Location:		*B-222*	*B-223*	*B-224*	*B-225*	*B-225*	*B-226*	*B-260*	*B-261*
Sample ID:		*B-222 S-1 0-2*	*B-223 S-1 0-2*	*B-224 S-1 0-2*	*B-225 S-1 0-2*	*B-225 S-2 2-4*	*B-226 S-1 0-2*	*B-260*	*B-261*
Sample Date:		*7/15/2008*	*7/15/2008*	*7/15/2008*	*7/15/2008*	*7/15/2008*	*7/15/2008*	*7/16/2008*	*7/16/2008*
Sample Type:									
Sample Depth:		*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(2-4) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*
Parameters	*Units*								
PCBs									
Aroclor-1016 (PCB-1016)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1221 (PCB-1221)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1232 (PCB-1232)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1242 (PCB-1242)	mg/kg	4.9	4.8	0.10 U	0.87	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1248 (PCB-1248)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.098 U
Aroclor-1254 (PCB-1254)	mg/kg	3.1	5.4	3.2	1.2	0.10 U	0.52	6.4	0.098 U
Aroclor-1260 (PCB-1260)	mg/kg	0.11 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.98 U	0.19
Aroclor-1268 (PCB-1268)	mg/kg	-	-	-	-	-	-	-	-
Total PCBs	mg/kg	8	10.2	3.2	2.07	0.10 U	0.52	6.4	0.19

TABLE 1
SHA SOIL ANALYTICAL SUMMARY
CITY SCRAP SITE UPPER YARD
AUGUST 2008

AOI:		*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*	*UPPER YARD*
Sample Location:		*B-275*	*B-276*	*B-277*	*B-278*	*B-279*
Sample ID:		*B-275 S-1 0-2*	*B-276 S-1 0-2*	*B-277 S-1 0-2*	*B-278 S-1 0-2*	*B-279 S-1 0-2*
Sample Date:		*7/17/2008*	*7/17/2008*	*7/17/2008*	*7/17/2008*	*7/17/2008*
Sample Type:						
Sample Depth:		*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*
Parameters	*Units*					
PCBs						
Aroclor-1016 (PCB-1016)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1221 (PCB-1221)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1232 (PCB-1232)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1242 (PCB-1242)	mg/kg	2.3	4.1	3.6	2.4	3.7
Aroclor-1248 (PCB-1248)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1254 (PCB-1254)	mg/kg	9.6	7.1	4.3	2.5	3.7
Aroclor-1260 (PCB-1260)	mg/kg	1.0 U	2.1 U	1.0 U	0.42 U	1.2 U
Aroclor-1268 (PCB-1268)	mg/kg	-	-	-	-	-
Total PCBs	mg/kg	11.9	11.2	7.9	4.9	7.4

FW: Former City Scrap - Connector Road
Paul Gallagher
to:
Kenneth Bardo
08/16/2012 08:22 AM
Cc:
"Knott, Charles J.", "Oberster, Alan C."
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA,
Cc: "Knott, Charles J." <charles.knott@timken.com>, "Oberster, Alan C." <alan.oberster@timken.com>
History: This message has been replied to.

1 Attachment

20120816 USEPA Work Plan ltr.pdf

Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

Paul
--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

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From: Paul Gallagher
Sent: Wednesday, July 11, 2012 12:15 PM
To: 'Kenneth Bardo'
Cc: 'Oberster, Alan C.'
Subject: FW: Former City Scrap - Connector Road

taken at 0-2' to see if PCB levels are >1ppm.

- based on these sample results, manage cut soils within the restricted (fenced) area accordingly. that is, soils with <1ppm PCBs can be used as fill. soils with PCBs >1ppm but <10 ppm can be managed onsite within the restricted (fenced) area if room is available or disposed of properly offsite if room is not available.
- the new fence may be placed at the perimeter of the cut area/edge of the new connector road feeding the new auto prep building.
- update Exhibit A and B of the deed restriction to define the new restricted area when work is complete.
- have a company representative onsite during the cut activities within the restricted (fenced) area to observe if anything unusual is encountered at depth (i.e., waste material, staining, etc.) that needs to be segregated and characterized to determine if it is appropriate fill material or should be properly disposed of offsite.

From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Oberster, Alan C." <alan.oberster@timken.com>
Date: 06/21/2012 04:11 PM
Subject: Former City Scrap - Connector Road

Hi Ken,

Thanks for calling me today. I have attached the updated figures that I mentioned. As we discussed, here's the key issues that we have identified regarding the proposed connector road through the western portion of the site:

1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.

2) The road cut will require soils that are currently located within the fenced area to be reused as fill near the eastern end of the site. As shown on the attached figures, a portion of the excavated soils will have concentrations of PCBs greater than 1 ppm, so they will need to be managed appropriately.

3) The City of Akron wants to begin earthwork this summer, and we're trying to support their schedule.

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333

FW: Former City Scrap - Connector Road
Paul Gallagher
to:
Kenneth Bardo
07/11/2012 11:22 AM
Cc:
"Oberster, Alan C."
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA,
Cc: "Oberster, Alan C." <alan.oberster@timken.com>

1 Attachment

20120711 TSB PCB prop.pdf

Hi Ken:

We're sending this message to summarize the upcoming supplemental soil sampling activities at the former City Scrap and Salvage property (Site). The attached Work Plan for Supplemental PCB Cleanup Activities is based on your message below and our follow-up telephone conversation. The objective of the supplemental soil sampling is to further develop our understanding of the distribution of PCBs in soils within the eastern portion of the fenced area, where the conditions of the prior PCB cleanup restricts how excavated soils can be managed. The findings of the supplemental soil sampling will be the basis for our development of a Soil Management and Disposal Plan, which will be submitted for your approval.

The City is still working out some of the contracting issues for the road, but they hope to start the road construction later this summer. We have tentatively scheduled activities for the soil sampling to begin later this week, and we anticipate that we will complete the Soil Management and Disposal Plan for your review in early August.

Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

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3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
T 330.668.6506 , C 330.705.0543
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Thanks for your help.

Paul

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Paul P. Gallagher, P.G., C.P.
Project Director

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[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US]

City Scrap/ TSB Metals Supplemental Cleanup
Paul Gallagher
to:
Kenneth Bardo
09/28/2012 12:51 PM
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA,
History: This message has been replied to.

Hi Ken:

Would you be available on Monday to participate in a 15 minute telephone conversation to update you on the status of the supplemental cleanup at TSB Metal Recycling in Akron, Ohio?

Thanks,

Paul
--
Paul P. Gallagher, P.G., C.P.
Project Director

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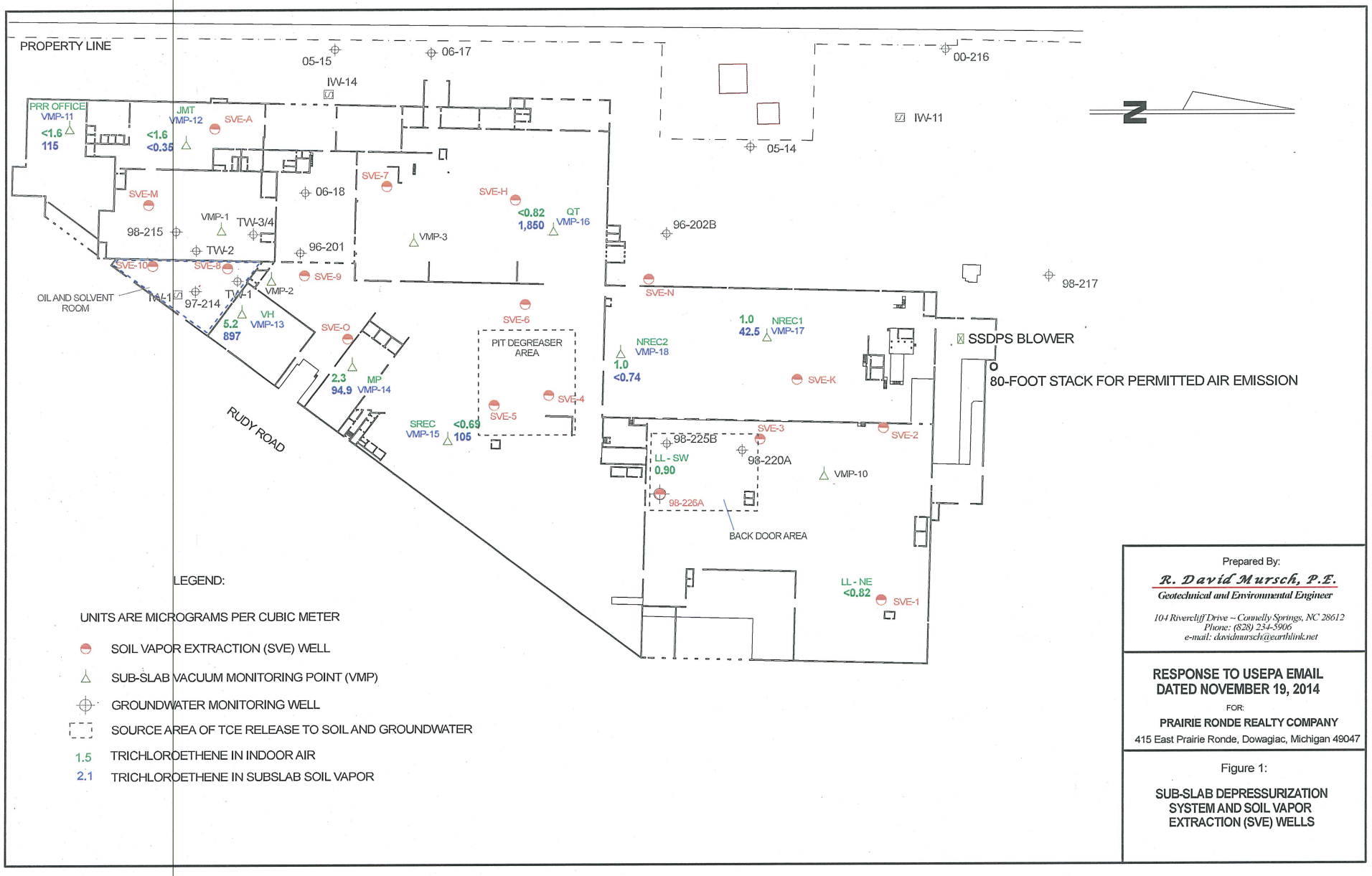

Prepared By:

R. David Mursch, P.E.

Geotechnical and Environmental Engineer

104 Rivercliff Drive ~ Connelly Springs, NC 28612
Phone: (828) 234-5906
e-mail: davidmursch@earthlink.net

RESPONSE TO USEPA EMAIL DATED NOVEMBER 19, 2014

FOR:

PRAIRIE RONDE REALTY COMPANY

415 East Prairie Ronde, Dowagiac, Michigan 49047

Figure 1:

SUB-SLAB DEPRESSURIZATION SYSTEM AND SOIL VAPOR EXTRACTION (SVE) WELLS

TSB Metals - Responses to USEPA Comments
Paul Gallagher
to:
Paul Gallagher, Kenneth Bardo
08/29/2012 02:29 PM
Cc:
"Oberster, Alan C.", "Knott, Charles J."
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Paul Gallagher <pgallagher@sanbornhead.com>, Kenneth Bardo/R5/USEPA/US@EPA,

Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>

1 Attachment

20120828-ConnectorRd Area.pdf

My earlier message omitted the attached figure. Sorry about that.

From: Paul Gallagher
Sent: Wednesday, August 29, 2012 3:00 PM
To: 'Kenneth Bardo'
Cc: Oberster, Alan C.; 'Knott, Charles J.'
Subject: FW: Greg, pls review before I send this

Hi Ken:

Here's a summary of our telephone conversation yesterday about the supplemental PCB cleanup at the former City Scrap & Salvage property in Akron, Ohio. Our responses to your four comments in your message below are:

1) Borings B618 and B619 were not associated with the supplemental PCB sampling outlined in our work plan dated July 11, 2012. These soil borings were contingency explorations for the petroleum hydrocarbon investigation near the former auto prep area. We archived the samples obtained from borings B618 and B619, pending the analyses of soil samples obtained from borings located closer to the former auto prep area. Since the total petroleum hydrocarbon concentrations in soils near the former auto prep area were favorable, there was no need to analyze additional samples from outbound borings B618 and B619.
2) At B616, the laboratory was unable to report a lower detection limit due to matrix interferences during the analyses, and the hold time expired before the lab could rerun the analysis. We resampled B616 last week, and the laboratory is currently analyzing a soil sample from this location. We're anticipating that the laboratory can achieve a lower detection (i.e., <1 ppm). The proposed excavation area will be adjusted if the concentration of PCBs at B616 is greater than 1 ppm.
3) The final report will provide the information requested below. As we discussed yesterday, some of the soil may be disposed of at a different landfill, because the TCLP lead concentration in the waste characterization composite sample was slightly greater than 5 milligrams per liter. Once the final disposal arrangements have been made, we will provide a follow-up email that specifies which landfills will be used.
4) Arrangements are being made to install the fence before the road construction activities begin.

- Ensure that the cut and fill activities associated with the proposed connector road do not impinge within the proposed fence area where PCBs >1 pppm remain (at Borings B-123, B505, B507, B508, B608). Consider erecting the proposed relocated fence in this area before road construction activities to delineate the area not to be disturbed.

From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Knott, Charles J." <charles.knott@timken.com>, "Oberster, Alan C." <alan.oberster@timken.com>
Date: 08/16/2012 08:22 AM
Subject: FW: Former City Scrap - Connector Road

Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

Paul
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Paul P. Gallagher, P.G., C.P.
Project Director

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From: Paul Gallagher
Sent: Wednesday, July 11, 2012 12:15 PM
To: 'Kenneth Bardo'
Cc: 'Oberster, Alan C.'
Subject: FW: Former City Scrap - Connector Road

Hi Ken:

We're sending this message to summarize the upcoming supplemental soil sampling activities at the former City Scrap and Salvage property (Site). The attached Work Plan for Supplemental PCB Cleanup Activities is based on your message below and our follow-up telephone conversation. The objective of the supplemental soil sampling is to

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To: Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Oberster, Alan C." <alan.oberster@timken.com>
Date: 06/21/2012 04:11 PM
Subject: Former City Scrap - Connector Road

Hi Ken,

Thanks for calling me today. I have attached the updated figures that I mentioned. As we discussed, here's the key issues that we have identified regarding the proposed connector road through the western portion of the site:

1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.

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[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US]

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